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December 9, 2003

FILED ELECTRONICALLY

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Ex Parte* Communication  
MB Docket No. 03-15, Second Periodic Review of the Commission's Rules and  
Policies Affecting the Conversion of Digital Television

Dear Ms. Dortch:

On Monday, December 8, 2003, Bruce Allan, Dale Mowry, Jay Adrick, and Tania Hanna of the Harris Corporation ("Harris") and the undersigned met with Rick Chessen, Mary Beth Murphy, Eloise Gore, John Wong, Sara Mahmood, and Peter Corea of the Commission's Media Bureau to discuss equipment cost differentials under several DTV transition scenarios.

At the staff's request, Harris provided an overview of estimated costs to be expected by broadcast stations transitioning from analog to digital transmission under several different scenarios involving initial out-of-core channels. The comparisons estimate the high end of costs expected when a broadcast station constructs its temporary digital facilities to typical full authorized power on an out-of-core channel and then moves to its final in-core channel when the final channel is substantially removed from its temporary channel, compared to broadcasting at reduced power on its temporary out-of-core channel and then moving to its final UHF or VHF allotment with full power. The examples for solid state UHF transmitters use output powers of 1.8 kW for low power, which typically yields 35-40 kW ERP, and 14 kW for full power, which typically yields 250-350 kW ERP; examples of final VHF installations use 3.5 and 7 kW transmitter output powers, which equate to 21-35 and 42-70 kW ERP respectively, and are typical of high band (ch.7-13) VHF powers.<sup>1</sup> The examples for high powered UHF tube transmitters use output powers of 30 kW, which typically yields 400-500 kW ERP, and 60 kW, which typically yields 800-1000 kW ERP. Copies of two slides that represent the discussion are attached.

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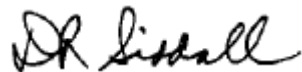
<sup>1</sup> The effective radiated power (ERP) of DTV stations varies depending upon the area to be served and the height of the transmitting antenna; and for VHF stations, also upon their geographic zone. See 47 C.F.R. § 73.622(f), *DTV maximum power and antenna heights*.

Ms. Marlene Dortch  
December 9, 2003  
Page 2

Other comments at the meeting are fully reflected in the Comments and Reply Comments filed by Harris in the above-referenced proceeding.

In accordance with Section 1.1206 of the Commission's Rules, 47 C.F.R. §1206, one copy of this letter is being filed electronically and a copy sent to each FCC participant. Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "DR Siddall". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

David R. Siddall  
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

DRS:er  
Attachments (2)